

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Vascular Access Centers, L.P.,

Debtor.

Hon. Ashely M. Chan

Chapter 7

Case No. 19-17117 (AMC)

DECLARATION OF ELIZABETH MATHEWS

ELIZABETH MATHEWS, pursuant to 28 U.S.C. § 1746, being of full age, hereby
declares as follows:

1. I am Senior Director of Financial Analytics with the law firm of Faegre Drinker Biddle & Reath LLP (“**Faegre Drinker**”).
2. This Declaration is provided in support of the former William Whitfield Gardner’s *Supplemental Application for Sanctions Amount* filed contemporaneously herewith (“**Application**”).
3. In my role as Senior Director of Financial Analytics, I regularly seek to obtain information about the billing rates charged by other large law firms in the cities in which Faegre Drinker has offices as well as in the markets in which our attorneys practice, including in Philadelphia, Pennsylvania, and in the Northeast and Mid-Atlantic markets more broadly. For example, I routinely review firm billing rates compared to peer firms in customized surveys in which the firm participates, review articles in the legal press about current legal billing rates, discuss billing rates with industry experts, and solicit anecdotal information from lawyers in my firm who from time to time see invoices generated by other law firms. As such, I am familiar

with the hourly rates for attorneys and paraprofessionals in the Northeast and Mid-Atlantic legal markets.

4. Similarly, part of my role is to assist Faegre Drinker in establishing billing rates (from paralegals to junior associates to senior partners) that are competitive with other peer firms across the country with whom we compete for business and talent and that, like Faegre Drinker, have many lawyers working in smaller markets outside of major metropolitan areas. These rates are set after in-depth market research by retained professionals, and they are reviewed and adjusted each year.

5. Faegre Drinker establishes its competitive billing rates by evaluating market data, including the solicitation of rate survey data from third-party sources, and other available resources. The most recently available external rate survey, conducted by an industry leading third-party for 2024 rates, indicates that Faegre Drinker's standard billing rates are generally below the median of both the participating AmLaw 100 firms and, more directly, our immediate group of peer firms.

6. I am familiar with the rates our firm charges for attorneys and paraprofessionals at different levels, including those rates charged for the attorneys primarily involved in this matter, including Richard Coe, Joseph Argentina, and Brendan McHugh. The rates charged for their services are well within the range of rates charged by comparable firms for professionals with similar experience and skills and are rates that are regularly paid by clients across the Northeast and Mid-Atlantic markets.

7. I have also reviewed the rates charged over time to Gardner in this matter as reflected in Exhibit 1 to the Coe Declaration.¹ The fees referenced in Exhibit 1 to the Coe

¹ Capitalized terms used herein but not defined herein have the meanings as set forth in the Application.

Declaration were determined principally by the amount of time spent in connection with assisting Gardner in responding to the Sanctions Appeal and otherwise in connection with the Sanctions Motion, and in responding to the Trustee Appeal, taking into consideration the amounts customarily charged by attorneys in this area for such services, the experience and expertise of each attorney who performed services, the degree of urgency, and other matters customarily considered by attorneys in charging for services.

8. Based on my experience, I believe and declare that the rates recorded by Faegre Drinker attorneys and set forth in Exhibit 1 of the Coe Declaration are reasonable for their respective markets, including Pennsylvania, given the complexity and this case and the nature of the work performed.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on April 17, 2025

/s/ Elizabeth Mathews
Elizabeth Mathews